



Department of Law
Monroe County, New York

Adam J. Bello
County Executive

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County Attorney

February 18, 2024

By ECF and Email

Hon. Charles J. Siragusa, U.S.D.J.
United States District Court
Western District of New York
100 State Street
Rochester, NY 14614

Re: *Brandon Lucas v. Shawn Eichas, et al.*, Case No. 22-cv-6463-CJS-MJP

Dear Judge Siragusa:

I write with respect to the above referenced matter and on behalf of my colleague, Robert Shoemaker, who is counsel of record for defendants Monroe County Sheriff Todd Baxter and Sheriff's Deputy Brandon Gulisano.

Pursuant to the Court's September 13, 2023 Amended Scheduling Order (Dkt. No. 16), all dispositive motions are due by tomorrow, February 19, 2024. This past Friday, Mr. Shoemaker completed a week-long jury trial before the Hon. Marian Payson. Mr. Shoemaker had intended to draft his motion papers over this weekend, but unfortunately due to an unforeseen medical issue, has been hospitalized since yesterday, and is expected to remain so through tomorrow. This is the reason for my writing on Mr. Shoemaker's behalf, and why I am writing the evening before the due date, for which I apologize.

I am respectfully requesting a two-week adjournment of the date to file dispositive motions – until March 4, 2024. Mr. Shields, counsel for plaintiff, has generously responded to my reaching out to him on a Sunday evening and has consented to this request. It is my understanding that the City of Rochester defendants are no longer parties to the case. Thank you kindly for your consideration.

Respectfully yours,

Maria E. Rodi

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cc: Mr. Elliot Shields, Esq., counsel for plaintiff, *by ECF and Email*